



January 10, 1994

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RE: Submittal of Modifications to the Groundwater Monitoring Phase II Report for Quemetco, Inc.
submitted October 21, 1993, Pursuant to Consent Decree CV. 86-6644, Remedial Action Order
HWCA 85/86-CO5, and Revised Agreements

Ladies and Gentlemen:

Enclosed please find the above referenced modifications for your review. The rationale for each modification is summarized in Attachment A.

If you have any questions concerning this matter, please contact me at (214)631-6070.

Sincerely,

A handwritten signature in blue ink, appearing to read "S.K. Reynolds".

Stephen K. Reynolds
Regulatory Specialist
Environmental Services

cc: Lynn L. Bergeson, Esq.
Robert E. Finn, Quemetco, Inc.
Frank Gardner, U.S. EPA
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ATTACHMENT A
QUEMETCO, INC.
CITY OF INDUSTRY, CALIFORNIA
MODIFICATIONS TO PHASE 2 GROUNDWATER MONITORING PLAN
SUBMITTED OCTOBER 20, 1993

The following modifications are proposed to the Phase 2 Groundwater Monitoring Plan (GMP) submitted on October 20, 1993.

Discussion 1

Table 2 provides Environmental Protection Agency (EPA) analytical methods for pH and specific conductance. These physical parameters will not require the use of EPA Methods, because the pH and specific conductance will be monitored in the field at the time of sample collection.

Plan Modification 1

Table 2 has been modified by omitting the EPA method for pH and specific conductance and specifying that these parameters will be determined in the field.

Discussion 2

Section 4.1, first paragraph, last sentence, states that all field measurements will be recorded in a field log book. During sample collection, field measurements will be recorded on field sampling forms, so it will not be necessary to use a field log book. The field sampling forms will be submitted on a quarterly basis with the site monitoring reports.

Plan Modification 2

Section 4.1 has been modified to omit the field log book and include field sampling forms.

Discussion 3

Table 3 lists analytical parameters that are not proposed for analysis in the GMP. TOC, TOX, sodium, calcium, potassium, carbonate/bicarbonate and phenols were inadvertently included in the table. Because these analytical parameters are not proposed for analysis, they will be omitted.

Plan Modification 3

Table 3 has been modified by omitting TOC, TOX, sodium, calcium, potassium, carbonate/bicarbonate and phenols.

Discussion 4

Section 4.2, second paragraph, first sentence, proposes the use of a stainless steel submersible pump (Grundfos Read-Flow 2) for purging well water. Instead of limiting the purging device to a Grundfos Read-Flow 2 pump, any stainless steel submersible pump or bailer will be used to purge well water.

Plan Modification 4

Section 4.2 has been modified by omitting the use of a Grundfos Read-Flow 2 pump and including the use of any stainless steel submersible pump or a bailer.

Discussion 5

Section 4.2, last paragraph, last sentence proposes the use of Department of Transportation (DOT) approved 55-gallon steel drums with locking lids for the containment of purge water. The use of a locking lid will not be required since the purge water within the drums will be transferred to the onsite water treatment system shortly after the wells are purged.

Plan Modification 5

Section 4.2 has been modified by removing the reference to locking lids and indicating that the purge water will be transferred to the water treatment system at the site.

Discussion 6

Section 4.3, second paragraph, second sentence, states that groundwater samples which require filtration will be field filtered using a peristaltic pump. To allow greater flexibility during sample collection, the option to have the samples filtered by the laboratory will be included in the GMP. Samples submitted to the laboratory will be filtered in a timely manner so that the integrity of the samples is not compromised. If samples are filtered in the field, any 0.45-micron filtering system will be acceptable for sample filtration.

Plan Modification 6

Section 4.3 has been modified to allow the option of having samples filtered in the laboratory. If samples are filtered in the field, any 0.45-micron filtering system will be used to filter the samples. Consequently, Appendix D has been omitted.

Discussion 7

Section 5.0, last bullet item, referencing the use of deionized water for equipment decontamination, should be changed to distilled water. Distilled water is readily accessible and relatively inexpensive relative to deionized water. The distilled water will be sufficiently pure to ensure that the equipment is thoroughly decontaminated.

Plan Modification 7

Section 5.0 has been modified to reference the use of distilled water instead of deionized water.

Discussion 8

Section 5.0, last paragraph is the same as discussion 5.

Plan Modification 8

Section 5.0 has been modified as in discussion 5.

Discussion 9

Section 6.2 requires that one equipment blank will be collected for each day of sampling. The plan will be modified to indicate that one equipment blank per sampling event will be collected. It is not necessary to collect one equipment blank per day of sampling since only approximately 10 samples will be collected during each sampling event.

Plan Modification 9

Section 6.2 has been modified to include one equipment blank per sampling event.

Discussion 10

Section 7.2 requires the use of sample seals on each sample container. Sample seals will not be necessary because, as a standard operational procedure, the shipping containers will be shipped with custody seals.

Plan Modification 10

Section 7.2 has been omitted.

Discussion 11

Section 7.5 references the same topic as Discussion 2.

Plan Modification 11

Section 7.5 has been omitted.

Key to Replacement Pages

- Remove and replace cover Title Page
- Remove and replace Table of Contents (pages i and ii)
- Remove and replace Table 2
- Remove and replace Page 13
- Remove and replace Table 3
- Remove and replace Page 16
- Remove and replace Page 17
- Remove and replace Page 19
- Remove and replace Page 20
- Remove and replace Page 22
- Remove Page 23
- Remove and replace Section 8.0 and 9.0
- Remove Appendix D